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VIA ECF

May 29, 2025

Hon. Jennifer L. Rochon
Southern District of New York
500 Pearl Street, Room 1920
New York, NY 10007

RE: Hurlock v. Kelsier Ventures et al., 1:25-cv-03891 (S.D.N.Y.)

Dear Judge Rochon,

We represent Defendant Benjamin Chow in the above-referenced matter, and write pursuant to Section 1.F of Your Honor's Individual Rules of Practice in Civil Cases to respectfully request an extension of the dates set forth in the Court's Temporary Restraining Order dated May 27, 2025 (the "TRO") with respect to Mr. Chow.

In the TRO, Your Honor instructed Defendants to show cause as to why a preliminary injunction should not extend the TRO for the pendency of this action; set deadlines of June 2, 2025 for opposing papers and June 5, 2025 for reply papers; and scheduled a hearing on June 9, 2025 at 10:00 AM. Plaintiffs' counsel served the TRO on Mr. Chow via email on May 28, 2025, at approximately 12:30 PM. Mr. Chow intends to oppose the TRO and preliminary injunction, and respectfully requests that the Court permit him additional time to prepare a fulsome response.

Specifically, Mr. Chow respectfully requests that Your Honor adjourn the schedule set forth in the TRO and extend Mr. Chow's deadline to oppose the TRO and issuance of a preliminary injunction to June 27, 2025. Although we conferred with Plaintiff's counsel on scheduling, they did not respond before we filed this letter to comply with Your Honor's Rules. We will continue to confer with Plaintiff's counsel and provide a proposed schedule for Plaintiff's reply brief and alternate dates for a hearing as soon as possible.

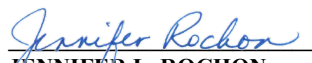
Mr. Chow agrees to abide by the TRO pending resolution of the motion. This is Mr. Chow's first request for an adjournment of deadlines relating to the TRO.

Respectfully submitted,

/s/ Sheila C. Ramesh
Sheila C. Ramesh

cc: All attorneys via ECF

SO ORDERED.


JENNIFER L. ROCHON
United States District Judge

Request GRANTED. The briefing schedule and hearing date set forth in the TRO are ADJOURNED and the Defendants' opposition brief is due **June 27, 2025**. The parties shall file a joint letter with the Court no later than **June 3, 2025**, with proposed dates for a reply and TRO/PI hearing. On consent, the TRO shall remain in place until the rescheduled hearing. If Defendants other than Chow or Circle wish to move to lift the TRO sooner than the aforementioned schedule, they may file a motion to do so.

Dated: May 30, 2025
New York, New York